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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO VENUE

UNITED STATES OF AMERICA, ) No. C 05-4185 SC

Plaintiff,

V.

1. \$250,110 IN UNITED STATES CURRENCY, AND

No. C 05-4185 SC

## 2. REAL PROPERTY AND IMPROVEMENTS

2. REAL PROPERTY AND IMPROVEMENTS )  
AT 166 LOS POBLES DRIVE )  
PROCEEDINGS )

) **PROCEEDINGS**  
2. REAL PROPERTY AND IMPROVEMENTS )  
AT 166 LOS ROBLES DRIVE, )  
BURLINGAME, CALIFORNIA )

## Defendants.

**STIPULATION REQUESTING  
FURTHER STAY OF FORFEITURE  
PROCEEDINGS**

IT IS HEREBY STIPULATED by and between plaintiff United States of America and claimants Eric Cai, Zhoren Cai and CitiMortgage Inc., through undersigned counsel, that this action continue to be stayed pursuant to 21 U.S.C. § 881(j). Eric Cai, who has filed a claim contesting the forfeiture of the defendant property, has been charged by a criminal complaint with drug trafficking and money laundering offenses in the Northern District of California. The underlying criminal activity alleged in the criminal complaint forms, in large part, the basis for the forfeiture allegations in the government's amended complaint for forfeiture. Consequently, the parties agree that a stay in the forfeiture proceeding is appropriate in order to preserve Eric Cai's right against self-incrimination in the related criminal

**STIPULATION RE STAY OF FORFEITURE PROCEEDINGS  
(ERIC CAI)**

1 matter. The parties thus request that matter be stayed pending resolution of the related criminal  
2 prosecution against Eric Cai. Accordingly, the parties request that the case management conference  
3 currently set for September 7, 2007, be vacated and that the matter be set for status on November 2,  
4 2007, or as soon thereafter as the Court may hear this matter. Government counsel advises that she will  
5 be unavailable from September 1 -17, 2007.

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7 DATED: 08/29/07

/S/

8 STEPHANIE M. HINDS  
Assistant United States Attorney

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10 DATED: 08/28/07

/S/

11 RANDY MONTESANO  
Attorney for Eric Cai and Zhaoren Cai

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13 DATED: 08/29/07

/S/

14 MICHAEL H. CHANG  
Attorney for CitiMortgage Inc.

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18 IT IS HEREBY ORDERED:

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20 Upon the stipulation of counsel, and good cause appearing, the above-entitled civil forfeiture  
21 action is stayed in light of the pending related criminal prosecution of Eric Cai. The case management  
22 conference scheduled for September 7, 2007 is vacated. The matter is continued to 11/30/07 for  
23 status.

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25 DATED: 8/30/07



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